

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

THE UNITED STATES OF AMERICA)	
)	
Plaintiff,)	
vs.)	
)	4:14 CR 00088 RWS (SPM)
)	
DIONNE GATLING, et al.,)	
)	
Defendants.)	

**DEFENDANT GATLING’S MOTION FOR LEAVE TO FILE
DEFENDANTS’ JOINT RESPONSE TO THE GOVERNMENT’S MOTION FOR
CLOSURE OF THE COURTROOM AS TO ONLY CS#1’S TESTIMONY
UNDER SEAL OF COURT**

Come now Defendants, by and through undersigned counsel, and for the Defendants’ Joint Response to the Government’s Motion for Closure of the Courtroom as to Only CS#1’s Testimony Under Seal, states as follows:

Defendants seek leave to file their Joint Response to the Government’s Motion for Closure of the Courtroom as to Only CS#1’s Testimony Under Seal inasmuch as the Response contains confidential information.

WHEREFORE, for the foregoing reasons, Defendants pray that this Court grant them leave to file the Defendants’ Joint Response to the Government’s Motion for Closure of the Courtroom as to Only CS#1’s Testimony Under Seal, and for such other and further Orders as the Court deems proper in the premises.

Respectfully Submitted,

/s/ **JoANN TROG**

JoAnn Trog 42725MO
Attorney for Dionne Gatling
121 West Adams Avenue
Saint Louis, Missouri 63122
Telephone: (314) 821-1111
Facsimile: (314) 821-0798
E-mail: jtrogmwb@aol.com

/s/ **PRESTON HUMPHREY, JR.**

Preston Humphrey, Jr.
Attorney for Timothy Lamont Rush
1015 Locust Street, Suite 413
Saint Louis, Missouri 63101
Telephone: (314) 621-1765
Facsimile: (314) 621-0020
E-mail: phumphrey@phlawstl.com

/s/ **ROBERT HERMAN**

Robert Herman
Attorney for Andre Alphonso Rush
8820 Ladue Road, Suite 201
Saint Louis, Missouri 63124
Telephone: (314) 862-0200
Facsimile: (314) 8620-3050
E-mail: bherman@laduelaw.com

/s/ **STEPHEN R. WELBY**

Stephen R. Welby
Attorney for Lorenzo Ralph Gibbs
1221 Locust Street, Suite 407
Saint Louis, Missouri 63103
Telephone: (314) 436-1888
Facsimile: (314) 436-1811
E-mail: welbylawfirm@yahoo.com

CERTIFICATE OF SERVICE

Signature of the foregoing document is also certification that a true and correct copy has been filed electronically with the Clerk of Court to be served by operation of the Court's electronic filing system upon Dean Hoag and Michael Reilly, Assistant United States Attorneys, 111 South 10th Street, 20th Floor, Saint Louis, Missouri 63102 on this 14th day of October, 2016.

/s/ ***JoAnn Trog***